

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

HIGHER EDUCATION LOAN AUTHORITY	)	
OF THE STATE OF MISSOURI,	)	
	)	
Plaintiff,	)	
	)	Cause No. 4:10-CV-01230-JAR
	)	
v.	)	
	)	
WELLS FARGO BANK, N.A.;	)	
WACHOVIA BANK, N.A., n/k/a	)	
WELLS FARGO BANK, N.A.;	)	
	)	
and	)	
	)	
WACHOVIA SECURITIES, LLC,	)	
	)	
Defendants.	)	

**PLAINTIFF'S CONSENT MOTION FOR EXTENSION OF TIME TO FILE  
ITS ANSWER TO WELLS FARGO BANK, N.A.'S COUNTERCLAIM**

Plaintiff Higher Education Loan Authority of the State of Missouri ("MOHELA"), for its Consent Motion for Extension of Time to File Its Answer to Wells Fargo Bank, N.A.'s Counterclaim, states:

1. MOHELA filed a Motion to Dismiss the Counterclaim of Wells Fargo Bank, N.A. ("Wells Fargo") in this case on February 2, 2012. On June 19, 2012, the Court denied MOHELA's Motion, and MOHELA's Answer to Wells Fargo's Counterclaim is due on July 3, 2012.
2. In order to afford MOHELA adequate time to prepare its Answer, MOHELA respectfully requests that the Court grant it an extension of time to file its Answer up to and including July 10, 2012.

3. Counsel for Wells Fargo has consented to MOHELA's request for an extension of time.

4. The extension of time requested by MOHELA will not prejudice Defendants and has not been requested in order to cause delay.

WHEREFORE, Plaintiff MOHELA prays that this Court make and enter its Order extending the time for MOHELA to file its Answer to Wells Fargo's Counterclaim up to and including July 10, 2012, and make and enter such other and further Orders as are just and proper in the premises.

KOHN, SHANDS, ELBERT,  
GIANOULAKIS & GILJUM, LLP

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Attorneys for Plaintiff

#### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 3rd day of July, 2012, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Jeffrey J. Kalinowski and Adam S. Hochschild, Bryan Cave, LLP, 211 North Broadway, Suite 3600, St. Louis, MO 63102-2750, attorneys for Defendants; and Mark P. Ressler, Michael A. Hanin, and Henry B. Brownstein, Kasowitz, Benson, Torres & Friedman, LLP, 1633 Broadway, New York, NY 10019, attorneys for Third-Party Defendants.

/s/ Kevin Anthony Sullivan